UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DAVID AMBROSE, individually and on behalf of all others similarly situated,

Plaintiff,

Case No. 1:22-cv-10195-RGS

v.

BOSTON GLOBE MEDIA PARTNERS, LLC,

Defendant.

JOINT NOTICE OF SETTLEMENT

Pursuant to the Court's March 28, 2023 Order (ECF No. 45), Plaintiff David Ambrose ("Plaintiff") and Defendant Boston Globe Media Partners, LLC ("Boston Globe," together with Plaintiff, the "Parties"), hereby submit this joint notice of settlement to inform the Court that the Parties have reached agreement on all material terms of a class action settlement of this matter. The Parties will finalize a full-form settlement agreement and Plaintiff will file a Motion for Preliminary Approval of the Class Action Settlement on or before May 19, 2023.

Dated: March 31, 2023

Respectfully submitted,

Respectfully submitted,

<u>/s/ Jeffrey G. Landis</u>

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Attorneys for Plaintiff and the Putative Class

CERTIFICATE OF SERVICE

I, Philip L. Fraietta, hereby certify that on March 31, 2023, a true and accurate copy of the foregoing document was filed electronically with the clerk of court via CM/ECF, which will then send a notification of such filing to all counsel of record and those who have registered for notice.

/s/ Philip L. Fraietta

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